1 HON. RICARDO S. MARTINEZ 2 HON. MICHELLE L. PETERSON 3 4 5 6 7 UNITED STATES DISTRICT COURT 8 WESTERN DISTRICT OF WASHINGTON 9 10 RAY HENDERSON MUSIC CO., INC., 11 Plaintiff, 12 Case No. 20-cv-0106-RSM-MLP V. 13 AMAZON.COM, INC. STIPULATED MOTION AMAZON DIGITAL SERVICES LLC, AND ORDER 14 VALLEYARM DIGITAL LIMITED. LENANDES LTD, GIACOMO VERANI, 15 and LIMITLESS INT. RECORDINGS, 16 Defendants. 17 18 19 The undersigned counsel for Plaintiff Ray Henderson Music Co., Inc., and for 20 Defendants Amazon.com Inc. and Amazon Digital Services LLC (together, 21 "Amazon"), hereby stipulate and agree as follows: 22 WHEREAS, on April 7, 2020, Amazon filed a Motion to Dismiss (Dkt No. 23); 23 and 24 WHEREAS, the parties have agreed, subject to the Court's approval, to a 25 revised briefing schedule; 26 27 MANN LAW GROUP PLLC STIPULATED MOTION 28 1420 Fifth Avenue - Suite 2200 Case No. 20-cv-0106-RSM-Seattle, WA 98101 Telephone: (206) 436-0900 **MLP**

| 1 | NOW, THEREFORE, the parties stipulate to the following schedule, subject to | | | | |
|----|---|--------|--|---|--|
| 2 | the Court's approval: | | | | |
| 3 | 1. | Plaint | tiff shall oppose Amazon's mo | tion or amend their | |
| 4 | complaint on or before Monday, May 11, 2020. | | | | |
| 5 | 2. | Defer | ndants' reply in support of Amazo | on's motion is due on | |
| 6 | Monday, May 25, 2020. | | | | |
| 7 | 3. | The n | oting date for Amazon's motion s | shall be Friday, May | |
| 8 | 29, 2020 . | | _ | | |
| 9 | Dated: April 22, 20 | 20 | | | |
| 10 | | | D (C11 1 2) 1 | | |
| 11 | | D | Respectfully submitted, | | |
| 12 | | By: | s/ Philip P. Mann Philip P. Mann, WSBA No: 288 | 860 | |
| 13 | | | MANN LAW GROUP PLLC 1218 Third Avenue, Suite 1809 | | |
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| 15 | | | Phone: (206) 436-0900 | | |
| 16 | | | E-mail: phil@mannlawgroup.co | om | |
| 17 | | | Brian S. Levenson * Pro Hac V | | |
| 18 | | | SCHWARTZ, PONTERIO & L 134 West 29th Street - Suite 100 | | |
| | | | New York, New York 10001 | <i>0</i> 1 | |
| 19 | | | Phone: (212) 714-1200 | | |
| 20 | | | E-mail: blevenson@splaw.us | | |
| 21 | | | Attorneys for Plaintiff | | |
| 22 | | | | | |
| 23 | | By: | s/ Kenneth L. Steinthal Kenneth L. Steinthal (Pro Hac | Vice) | |
| 24 | | | KING & SPALDING LLP | , | |
| 25 | | | 101 Second Street, Suite 2300 San Francisco, CA 94105 | | |
| 26 | | | Telephone: (415) 318-1200 | | |
| 27 | | | E-mail: ksteinthal@kslaw.com | | |
| 28 | STIPULATED MOTION Case No. 20-cv-0106-RSM-MLP | | 2 | MANN LAW GROUP PLLC 1420 Fifth Avenue – Suite 2200 Seattle, WA 98101 Telephone: (206) 436-0900 | |

STIPULATED MOTION

Case No. 20-cv-0106-RSM-

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MLP

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| 1 | CERTIFICATE OF SERVICE | | | | |
|---------------------------------|--|--------------------|--|--|--|
| 2 | I hereby certify on the date indicated below, I electronically filed the foregoing | | | | |
| 3 | with the Clerk of the Court using the CM/ECF system which will send notification of such | | | | |
| 4 | filing to all parties who have appeared in this matter. | | | | |
| 5 | | | | | |
| 6 | DATED: April 23, 2020. | /s/ Philip P. Mann | | | |
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Stipulated Motion Cause No. 20-cv-0106 Mann Law Group PLLC 1420 Fifth Avenue, Suite 2200 Seattle, WA 98101 Phone: 206.436.0900